

WILLIAM SHARP MANNING)
a/k/a "ILL WILL")
(Counts 1, 5, 9))
JAMES WATSON)
a/k/a "BLACK KAT")
(Counts 1, 5, 9))
CHRISTOPHER HEAD)
a/k/a "BRISS")
(Counts 1, 5))
NICOLE YATES)
a/k/a "MERLOT")
(Counts 9-11))
CANDY MINOR)
(Counts 9-11))
KALEEF TWEEDY)
a/k/a "BLOODY TWEED")
(Counts 9-11))
JUSTIN FINLEY)
a/k/a "J MO")
(Counts 5, 9))
STEPHON GREENE)
a/k/a "BLITZ")
(Counts 5, 9))
LATONYA SNOW)
a/k/a "LADY DYNASTY")
(Count 9))
DEVANTE JORDAN)
a/k/a "TREY")
(Counts 10-11))
AAYRON MARSHAL)
a/k/a "MOOK")
(Count 5))
)
)
)

JOSHUA PENDLETON BROOKS)
a/k/a "WACKO")
(Count 5))
)
LIONEL RITCHIE)
a/k/a "BOOGIE")
(Count 5))
)
JAMEEL ALEEM)
a/k/a "NINO B")
(Count 5))
)
ANTWAN MINOR)
a/k/a "NOID")
(Counts 5-7))
)
DEYONKA GASKINS)
(Count 5))
)
GRACIER ISIQUE,)
(Count 5))
)
Defendants.)
)

INDICTMENT

August 2013 Term—at Alexandria, Virginia

COUNT 1

THE GRAND JURY CHARGES THAT:

INTRODUCTION

1. In the early 1970's, "The Bloods" Street Gang was formed in Los Angeles, California. The gang was initially comprised of several smaller individual street gangs who unified as "The Bloods," to protect themselves from the larger Crips Street gangs.
2. The Bloods Street Gang is comprised of individual units or "sets," each identified or

affiliated with a certain street, neighborhood, or geographic area. Despite the differing geographic regions, the sets maintain common tattoos, communication codes, language, and graffiti markings, and members of every set are easily identified because they wear the color red. Additionally, Bloods maintain a long-term and often lethal rivalry with the Crips gang, among others, whose signature color is blue.

3. On July 16, 1993, at the George Mochen Detention Center on the east side of Rikers Island Correctional Facility, the "United Blood Nation" (UBN), a single Blood prison entity, was created by inmates. The founders decided that the different New York City African American gangs should unite while in the jail system under one organized gang in order to protect themselves from "The Almighty Latin King Nation," the largest prison gang in the New York prison system. All the "Blood" sets or gangs who unified under the UBN/Bloods Street Gang were allowed to keep their original set names, to wit:

- a. "Nine Trey Gangster Bloods" (formed in 1993)
- b. "One Eight Trey Blood's"
- c. "Mad Stone Villains"
- d. "Valentine Bloods"
- e. "Gangsta Killa Bloods" (GKB, and now known as G Shine Blood's)
- f. "Hit Squad Brims"
- g. "Blood Stone Villains"
- h. "Sex, Money, Murder"

These original sets were formed based upon their affiliation with certain streets, neighborhoods, areas, or local gangs and were all African American. As members were released from prison, the UBN/Bloods Street Gang philosophy spread across the streets of New York City.

4. Once the UBN/Bloods Street Gang spread from the prisons to the streets, UBN members devised code names in order to avoid identification by law enforcement. For instance,

the "Nine Trey Gangster Bloods" became known as "Billy Bad Ass," the One Eight Trey Bloods became known as "Diamond Gee's or Donald Gee's" a/k/a "Don's" and Sex Money Murder became known as "Blazing Billys."

5. The UBN/Bloods Street Gang has since spread across the east coast of the United States; however, the ultimate authority for gang decisions is still maintained in the New York City area and the New York State prison system, described by the UBN/Bloods Street Gang members as "up top." The gang maintains a strict hierarchy or chain of command. Although the set or line-up leaders are called by different names, such as "rims," "stains," "stars," and "floors," the rules are strictly enforced through the UBN/Bloods Street Gang chain of command. The UBN/Bloods Street Gang leadership includes a national council or board of directors. Council members or board of directors are selected from the leaders of the larger sets such as the "9 Trey Gangster Bloods."

6. The number 31 carries special significance within UBN. All sets of the UBN/Bloods Street Gang organization are governed by a common 31 rules. The rules were originally written by UBN founders. Examples of the rules are:

- a. Always go through the chain of command when possible;
- b. Never put anything or anyone before a Blood or Blood business;
- c. Always flag according to code;
- d. You do not "snitch" or cooperate with law enforcement;
- e. Always obey orders from higher ranking members in your chain of command;
- f. Learn your history and the history of the other sets in the UBN;

7. The rules also set forth the specifics of communication. The most common and accepted

methods of communication are: kites, jail house phones, contraband cell phones, text messaging, visitation, 9-11's (face to face meeting), and word of mouth. Kites are letters within and outside of prison; however, the kite must be delivered by a person either in the gang or an associate of the gang known to have direct access and knowledge of the sender. Inmates have access to telephones in prison and it is not uncommon for inmates to receive contraband cell phones which they use for gang communications.

8. The Bloods created a unique system of codes and hand signals they use to communicate with each other. These codes and hand signals were initially established to allow members of the UBN/Bloods Street Gang to communicate with each other in a way that hid the nature of their communication from law enforcement, rival gangs, and prison officials. Some of the most commonly used words by members of the UBN/Bloods Street Gang operating in various parts of the country are:

- a. "Damu" which means blood in the African language Swahili;
- b. "Inglewood" to describe gang knowledge (rules, codes and gang structure);
- c. "East Side" to show loyalty and affiliation to the UBN and East Coast Bloods;
- d. "O Trey One" which stands for Blood Love, or the way a Blood member was jumped into the gang, or a disciplinary beating a member received;

Like their counterparts in other areas, Bloods in Northern Virginia and the District of Columbia Metropolitan area use coded language to communicate with each other, including, but not limited to, the words and phrases described above. When speaking to each other, Bloods in Northern Virginia and the District of Columbia metropolitan area will not use the letter "c" because the word "Crip" begins with that letter. They will also not use the number 6 which shows affiliation with the Crips. Therefore, Bloods replace the letter "c" with the letter "b" when speaking to each

other. For instance, a Blood would say “ball me” rather than “call me;” Blood members will also replace the number 6 with the letter “b” to avoid any reference to the Crips. The Bloods in Northern Virginia and the District of Columbia metropolitan area also have code words they use to conceal their speech. For instance, “40 below” directs members to dress in non-gang colors or look like a neutral (non-gang member), “DP” stands for disciplinary punishment, “Ruby” stands for a Blood member’s wife, “Care bear” stands for the Blood member’s girlfriend, “Blood drop” stands for a Blood member’s baby, and “G-wall” represents a correctional facility.

9. The UBN/Bloods Street Gang also created a system of rules and regulations governing its membership and initiation process. These regulations establish a hierarchical membership structure. For example, a member who has founded a set of the Bloods, like the Nine Trey Gangsters, is called a “Godfather.” Other titles of respect within the UBN/Bloods Street Gang include, but are not limited to: “High Stain” or “Triple OG,” “Low Stain” or “Double OG,” “Original Gangsta,” or “OG”; and “General.” Nine Trey Gangster line-ups operating in Virginia are led by a “High Stain.” The High Stain appoints a “Low Stain,” the number two ranking member, and Generals with 1 through 5 stars where a 5-Star General would be the third in command of the line-up. Additionally, the rules governing initiation into the UBN/Bloods Street gang sometimes require those seeking membership to commit acts of violence and/or get beaten for 31 seconds by other members.

10. A “nine” or “9-11” refers to a gang meeting and is the method by which the enterprise, or “set” or “lineup,” is governed. A “nine” can be called by the ranking member of the “set” or “lineup” at any time. Members pay \$31 each month in membership dues which are collected sometimes at the “nine” or on the 15th day of the month. These dues are collected for

the benefit of the set and the UBN/Bloods Street Gang organization. A portion of the money is used to assist members who have been arrested and their families, and a portion of the money is sent to the organization's leadership "up top" in New York.

11. In order to become a UBN/Bloods Street Gang member, you must be introduced by an existing gang member or recruited by the line-up's 1-Star General and approved by the 4-Star General. Prospective members are "beat in" (physically beaten for 31 seconds by multiple gang members) and provided with a copy of the 31 rules and book of knowledge which the potential member must memorize. All gang members are required to "put in work" meaning they must carry out the activities of their set on behalf of the UBN/Bloods Street Gang Organization. "Putting in work" can mean committing robberies, selling drugs, conducting shootings, extortion of drug dealers, administering beatings or "DP's," prostitution or other activities, legal or illegal, which produce income for the UBN/Bloods Street Gang.

12. While UBN/Bloods Street Gang members are easily identified by their red clothing, tattoos are also an important method of identification. Common UBN/Bloods Street Gang tattoos are:

- a. The letters "M.O.B." (Member of Bloods);
- b. A five pointed star (to represent the five points of knowledge within the organization: life, love, loyalty, knowledge, and respect or wisdom and/or love, truth, justice, freedom and peace);
- c. Three circular brands which form a triangle, commonly known in the organization as "dog paws" which represents the UBN/Bloods Street Gang;
- d. The letters 9 Trey or NTG and various dog tattoos (references to dogs, particularly pit bull dogs, are common within the enterprise.)

13. The UBN/Bloods Street Gang leadership in New York City sanctions or approves the

individual states, cities, and towns that a UBN/Bloods Street Gang set will operate within. If members of a sanctioned or authorized set/line-up attempt to break away from the UBN/Bloods Street Gang organization, they will be punished by the organization. When a new line-up or member is approved, it is commonly referred to as being “stamped” or “you’re black and white.” This means the set/line-up or the new member is “real right” with their knowledge and has been physically written in a record book kept by a ranking member of the UBN/Bloods Street Gang in New York.

14. While incarcerated in North Carolina, THADDAEUS SNOW, a/k/a STORM, became a member of the Nine Trey Gangster Bloods set of UBN. After being released from the correctional institution in or around 2008, SNOW moved to the Northern Virginia area from North Carolina. Once he moved to the Northern Virginia area, SNOW was given permission to breed, Blood terminology for the recruitment of new members. THADDAEUS SNOW a/k/a STORM held the rank of 5-Star General when he was initially in the Northern Virginia area around 2008 and his superior was an individual known to the grand jury. After receiving permission to grow the gang’s ranks, SNOW recruited the following individuals into the Nine Trey Gangster Bloods: WILLIAM SYKES a/k/a BLACK, GEORGE WILLIAMS a/k/a CHAMP, and other individuals known to the Grand Jury. These three men became the leadership of SNOW’s line-up. Monthly meetings were held at THADDAEUS SNOW’s house and either a superior gang member known to the grand jury would run the meeting over a cellular phone from a correctional facility or SNOW would run the meetings.

15. In 2011, SNOW and CURTIS MARTINO, a/k/a CURTIS DODD, a/k/a RED RUM begin hanging around together. MARTINO also held the rank of 5-Star General in another

Nine Trey Gangster Blood line-up operating in Virginia. The two 5-Star Generals, SNOW and MARTINO, belonged to separate line-ups but the line-ups often worked together.

16. During the period of this conspiracy, Nine Trey Gangster Bloods created and maintained an organized hierarchal membership structure. At all times relevant to this indictment, Defendants THADDAEUS SNOW, a/k/a STORM, and CURTIS MARTINO, a/k/a CURTIS DODD, a/k/a RED RUM, were the primary leaders of Nine Trey Gangster Bloods line-ups operating within the Eastern District of Virginia and elsewhere. SNOW and MARTINO managed, promoted, and further established the criminal enterprise and directed lower ranking members to further the enterprise.

17. At all times relevant to this indictment, the following Defendants were members and/or close associates of the Nine Trey Gangster Blood set of the UBN/Bloods Street Gang:

- a) Thaddaeus Snow a/k/a Storm
- b) Curtis Martino a/k/a Curtis Dodd a/k/a Red Rum
- c) William Sharp Manning a/k/a Ill Will
- d) William Sykes a/k/a Black
- e) Christopher Head a/k/a Briss
- f) Deontae Holland a/k/a D-Boy
- g) James Watson a/k/a Black Kat
- h) George Williams a/k/a Champ
- i) Markeith Kerns a/k/a LTK
- j) Janee Yates, a/k/a Alizia
- k) Aayron Marshal a/k/a Mook
- l) Joshua Pendleton Brooks a/k/a Wacko
- m) Lionel Ritchie, a/k/a Boogie
- n) Jameel Aleem, a/k/a Nino B
- o) Antawn Minor a/k/a Noid
- p) Deyonka Gaskins
- q) Gracier Isique
- r) Nicole Yates a/k/a Merlot
- s) Candy Minor
- t) Kaleef Tweedy a/k/a Bloody Tweed

- u) LaTonya Snow
- v) Devante Jordan a/k/a Trey
- w) Justin Finley a/k/a J Mo
- x) Stephon Greene a/k/a Blitz

18. At all times relevant to this indictment, UBN/Bloods Street Gang members, including the Nine Trey Gangster Bloods, in the Eastern District of Virginia and elsewhere engaged in criminal activity, including but not limited to assault resulting in bodily injury, assaults with dangerous weapons, robbery, sex trafficking, drug trafficking, use and possession of illegal firearms, dealing and uttering counterfeit United States currency, and conspiracy to commit those crimes. Nine Trey Gangster Bloods members committed criminal acts and acts of violence to maintain membership and discipline within the gang. A Nine Trey Gangster Bloods ability to earn money for the organization through the commission of illegal acts, as well as his or her facility with UBN/Bloods Street Gang “knowledge” were factors in determining whether a member is promoted to a position of leadership within a Nine Trey Gangster Bloods line-up.

19. At various times during the period covered by this indictment, Nine Trey Gangster Bloods members met in order to, among other things, initiate new members, issue sanctions for failure to follow the rules or other real or perceived violations, plan future criminal activities, and report on business related to the gang enterprise, included but not limited to a discussion of crimes to be committed in furtherance of the enterprise, including drug trafficking, prostitution, acts of violence, and other activities.

THE RACKETEERING ENTERPRISE

20. The UBN/Bloods Street Gang, including its leadership, members, and associates, and which includes the Nine Trey Gangster Bloods set, constituted an “enterprise” as defined in Section 1961(4) of Title 18, United States Code, that is, a group of individuals associated in fact.

The enterprise constituted an ongoing organization, whose members functioned as a continuing unit for the common purpose of achieving the objectives of the enterprise. The enterprise was engaged in, and its activities affected, interstate commerce.

PURPOSES OF THE ENTERPRISE

21. The purposes of the enterprise included the following:

- a) Generating financial profits for the benefit, and in furtherance of, the enterprise;
- b) Protection of UBN/Blood Street Gang members and turf from all other gangs or threats;
- c) The defense of members of the enterprise who are insulted, threatened, or attacked.
- d) Providing assistance to members who committed crimes for and on behalf of the enterprise and thwarting efforts of law enforcement to apprehend members of the enterprise.

THE RACKETEERING CONSPIRACY

22. Beginning in and around 2008 and continuing to on or about the date of this indictment, in the Eastern District of Virginia and elsewhere, Defendants THADDAEUS SNOW a/k/a STORM, CURTIS MARTINO, a/k/a CURTIS DODD a/k/a RED RUM, WILLIAM SHARP MANNING, a/k/a ILL WILL, WILLIAM SYKES, a/k/a BLACK, CHRISTOPHER HEAD, a/k/a BRISS, DEONTAE HOLLAND, a/k/a D-BOY, JAMES WATSON, a/k/a BLACK KAT, GEORGE WILLIAMS, a/k/a CHAMP, MARKEITH KERNS, a/k/a LTK, and JANEY YATES, a/k/a ALIZIA, each being a person employed by and associated with the UBN/Bloods Street

Gang, an enterprise engaged in, and the activities of which affected interstate commerce, together with others known and unknown to the grand jury, did knowingly and intentionally conspire to conduct and participate, directly and indirectly, in the conduct of the affairs of the enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1), 1961(5) consisting of:

- a) Multiple acts involving the felonious distribution, receipt, buying, selling, and otherwise dealing in controlled substances, including cocaine, cocaine base (commonly known as “crack” cocaine), marijuana, heroin, Schedule II prescription painkillers, ecstasy, and other controlled substances, in violation of Title 21 U.S.C. Sections 841 and 846;
- b) Multiple acts involving robbery in violation of Virginia Code Sections 18.2-58, 18.2-22, 18.2-26, and 18.2-27.
- c) Multiple acts indictable under the following provisions of Title 18, United States Code:
 1. Sections 472 and 473 (relating to counterfeiting);
 2. Section 1591 (related to peonage, slavery, and trafficking in persons);
 3. Section 1951 (relating to interference with commerce by robbery and extortion); and
 4. Section 2421 and 2422 (relating to interstate transportation for prostitution);

MANNER AND MEANS OF THE CONSPIRACY

23. It was part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

24. It was further part of the conspiracy that THADDAEUS SNOW a/k/a STORM, CURTIS MARTINO, a/k/a CURTIS DODD a/k/a RED RUM, WILLIAM SHARP MANNING, a/k/a ILL WILL, WILLIAM SYKES, a/k/a BLACK, CHRISTOPHER HEAD, a/k/a BRISS, DEONTAE HOLLAND, a/k/a D-BOY, JAMES WATSON, a/k/a BLACK KAT, GEORGE WILLIAMS, a/k/a CHAMP, MARKEITH KERNS, a/k/a LTK, and JANEY YATES, a/k/a ALIZIA, as members of the UBN/Bloods Street Gang, and more specifically the Nine Trey Gangster Bloods set, would regularly meet as required with other UBN/Bloods Street Gang members to discuss, among other things, initiation of new members; “knowledge” being given to new members; collection of dues; the coordination of drug trafficking and other illegal crimes including robberies and sex trafficking; notifying one another about gang members who were arrested or incarcerated; violation of gang rules by gang members and the disciplining of those UBN/Bloods Street Gang members; the possible presence of law enforcement and interaction between law enforcement and UBN/Bloods Street Gang members; the identities of gang members who might be cooperating with law enforcement and propose actions to be taken against those individuals; and the enforcing and reinforcing of gang rules.

25. It was a further part of the conspiracy that the defendants and other members and associates of UBN/Bloods Street Gang maintained a cache of firearms for use in criminal activity by UBN/Bloods Street Gang members and for the defense of the UBN/Bloods Street Gang from rivals.

26. It was a further part of the conspiracy that the defendants and other members and associates of the UBN/Bloods Street Gang enterprise distributed controlled substances, including cocaine base (commonly known as “crack” cocaine), cocaine, heroin, marijuana, ecstasy, and Schedule II prescription painkillers and used the proceeds of those drug transactions to benefit gang members and to help finance the Enterprise.

27. It was a further part of the conspiracy that the defendants and other members of the UBN/Bloods Street Gang enterprise committed assaults causing bodily injury, assaults with dangerous weapons, including firearms, and other acts of violence against rivals of the gang and to maintain discipline within the UBN/Bloods Street Gang enterprise itself.

28. It was a further part of the conspiracy that the defendants and other members of the UBN/Bloods Street Gang enterprise were required to pay membership dues of \$31 each month. Dues were used to pay for commissary, defense counsel, firearms, bail, other needs of the UBN/Bloods Street Gang, and to compensate the gang leadership “up top” in New York.

29. It was a further part of the conspiracy that some defendants and other members and associates of the enterprise committed armed robberies to generate proceeds to support the enterprise.

30. It was a further part of the conspiracy that, in order to obtain illegal profits, the defendants and other affiliates of the Enterprise used interstate facilities and caused the interstate transportation of persons to engage in commercial sex acts (commonly referred to as prostitution), and used coercion in said commercial sex ventures.

31. It was further a part of the conspiracy that the defendants and other members and associates of the UBN/Bloods Street Gang obtained, dealt, and uttered counterfeit Federal

Reserve Notes (commonly referred to as counterfeit U.S. Currency) to purchase items, including narcotics, for the benefit of the Enterprise.

OVERT ACTS

In furtherance of the conspiracy and to achieve the objective thereof, the defendants, and others known and unknown to the grand jury, performed and caused to be performed a host of overt acts in the Eastern District of Virginia and elsewhere. The conspirators performed these other acts, including, but not limited to the following overt acts, among others, in the Eastern District of Virginia and elsewhere:

1. From at least 2008 through at least 2011, THADDAEUS SNOW a/k/a STORM provided GEORGE WILLIAMS a/k/a CHAMP, DEONTAE HOLLAND a/k/a D-BOY, AAYRON MARSHAL a/k/a MOOK, and multiple unindicted UBN/Bloods Street Gang members each with between 3.5 and 14 grams of cocaine base every few days for further distribution within the line-up's geographic area of operation.
2. From at least 2008 through at least 2010, THADDAEUS SNOW a/k/a STORM divided the area in and around Fauquier County, Virginia where his line-up of Nine Trey Gangster Bloods operated and assigned "turf" to specific gang members for them to distribute cocaine base, marijuana, and other narcotics within.
3. On or about April 1, 2010, THADDAEUS SNOW a/k/a STORM directed UBN/Bloods Street Gang members to look for L.B. and give L.B. a "Buck-Fifty," (consisting of slicing the face from mouth to ear with a knife aimed at requiring 150 stitches to close the wound), because L.B. had stolen the proceeds of UBN/Bloods Street Gang drug sales and disrespected THADDAEUS SNOW a/k/a STORM.
4. On or about April 1, 2010, WILLIAM SYKES a/k/a BLACK and JANEY YATES a/k/a ALIZIA encountered L.B. at an apartment in Fauquier County, Virginia, and used knives to cut LB's face in order to administer a "Buck-Fifty" to L.B as directed by THADDAEUS SNOW a/k/a STORM.
5. On or about April 12, 2010, GEORGE WILLIAMS a/k/a CHAMP authorized UBN/Bloods Street Gang members to assault D.D., if they encountered him, because of a dispute D.D. had with a UBN/Bloods Street Gang member.
6. On or about April 12, 2010, MARKEITH KERNS a/k/a LTK, WILLIAM SYKES a/k/a BLACK, and GEORGE WILLIAMS a/k/a CHAMP used multiple firearms to

shoot at D.D., A.R., and R.B. at the Cedar Lee Middle School in Fauquier County, Virginia, because of a dispute D.D. had with a UBN/Bloods Street Gang member.

7. Throughout 2010, JANEY YATES a/k/a ALIZIA distributed marijuana and cocaine base as directed by THADDAEUS SNOW a/k/a STORM and provided SNOW with the proceeds.
8. Throughout 2010, THADDAEUS SNOW a/k/a STORM directed an associate of the UBN/Bloods Street Gang to make sure JANEY YATES a/k/a ALIZIA sold all of the cocaine base and marijuana given to her by SNOW and threatened violence if she did not turn over the correct amount of money to him.
9. On multiple dates in and around 2010 and 2011, JANEY YATES a/k/a ALIZIA collected membership dues from UBN/Bloods Street Gang members and utilized grocery stores in Bealeton, Virginia, and Warrenton, Virginia, to wire the money collected to THADDAEUS SNOW a/k/a STORM.
10. From in and around 2010 through in and around 2011, THADDAEUS SNOW a/k/a STORM possessed a firearm while distributing cocaine base to other UBN/Bloods Street Gang Members.
11. In and around 2011, THADDAEUS SNOW a/k/a STORM, WILLIAM SYKES a/k/a BLACK, GEORGE WILLIAMS a/k/a CHAMP, DEONTAE HOLLAND a/k/a D-BOY, and AAYRON MARSHAL a/k/a MOOK, attempted to assault an unindicted UBN/Bloods Street Gang member because he wished to leave SNOW's Nine Trey Gangster line-up.
12. In and around 2011, a UBN/Bloods Street Gang member whose identity is known to the grand jury drove THADDAEUS SNOW a/k/a STORM, CURTIS MARTINO a/k/a CURTIS DODD a/k/a RED RUM, and KALEEF TWEEDY a/k/a BLOODY TWEED to New York to purchase heroin to be sold by UBN/Bloods Street Gang line-ups in Virginia.
13. Throughout 2012, THADDAEUS SNOW a/k/a STORM recruited a prostitute and forced and coerced her to perform commercial sex acts in Virginia, Maryland, North Carolina, New York, and other states.
14. In and around January 2012, and continuing through in and around March, 2012, CANDY MINOR drove a UBN/Bloods Street Gang prostitute to hotels and booked rooms for use by the prostitute.
15. During 2012, LATONYA SNOW transported a UBN/Bloods Street Gang prostitute to hotels and booked rooms for use by the prostitute.

16. On or about June 25, 2012, CHRISTOPHER HEAD a/k/a BRISS, used a telephone to discuss the purchase of 80 Ecstasy pills with an unindicted member of the UBN/Bloods Street Gang.
17. On four separate occasions, on or about June 25, 2012, on or about July 7, 2012, on or about August 11, 2012, and on or about September 7, 2012, LIONEL RITCHIE a/k/a BOOGIE contacted a higher-ranking unindicted UBN/Bloods Street Gang member using a telephone in order to obtain cocaine base for distribution.
18. On June 27, 2012, a "911," or gang meeting, was held and KALEEF TWEEDY a/k/a BLOODY TWEED and other unindicted UBN/Street Gang Members were in attendance.
19. On multiple occasions in and around the Spring and Summer of 2012, JAMEEL ALEEM a/k/a NINO B sold approximately 70 grams total of cocaine base to an unindicted UBN/Bloods Street Gang Member.
20. On or about June 28, 2012, CHRISTOPHER HEAD a/k/a BRISS and an unindicted member of the UBN/Bloods Street Gang used a telephone to contact JAMEEL ALEEM a/k/a NINO B because the money he turned over in furtherance of narcotics sales was smaller than expected.
21. On or about July 20, 2012, CHRISTOPHER HEAD a/k/a BRISS, used a telephone to send text messages to another UBN/Bloods Street Gang member to discuss a third gang member who violated UBN/Bloods Street Gang rules by smoking phencyclidine (commonly known as "PCP"). HEAD indicated he would contact CURTIS MARTINO a/k/a CURTIS DODD a/k/a RED RUM to inform him of the violation of gang rules.
22. On or about July 24, 2012, CHRISTOPHER HEAD a/k/a BRISS and an unindicted member of the UBN/Bloods Street Gang discussed the arrest by law enforcement of two other gang members and decided that a member with no or minimal criminal record would be told to accept responsibility for the crime.
23. In or around July or August of 2012, THADDAEUS SNOW a/k/a STORM attempted to recruit an 18 year-old girl, in Frederick, Maryland, to work as a prostitute for the UBN/Bloods Street Gang.
24. On or about August 8, 2012, ANTWAN MINOR a/k/a NOID informed an unindicted UBN/Bloods Street Gang member that he was about to "reup" his narcotics supply.
25. On or about August 13, 2012, an unindicted member of the UBN/Bloods Street Gang and CHRISTOPHER HEAD a/k/a BRISS used a telephone to discuss the disciplining

of LIONEL RITCHIE a/k/a BOOGIE for smoking phencyclidine (commonly known as "PCP") in violation of gang rules.

26. On or about August 13, 2012, an unindicted member of the UBN/Bloods Street Gang informed CHRISTOPHER HEAD a/k/a BRISS that he cannot pay CURTIS MARTINO a/k/a CURTIS DODD a/k/a RED RUM his dues because he just used his money to assist another UBN/Bloods Street Gang member who was recently arrested by law enforcement.
27. On or about August 14, 2012, CHRISTOPHER HEAD a/k/a BRISS used a telephone to send a text message indicating he needed to pick-up Ecstasy pills or prescription painkillers from an unindicted coconspirator.
28. On or about August 15, 2012, an unindicted member of the UBN/Bloods Street Gang and CHRISTOPHER HEAD a/k/a BRISS decided to assault LIONEL RITCHIE a/k/a BOOGIE in order to administer discipline because he violated UBN/Bloods Street Gang rules.
29. On or about August 20, 2012, an unindicted member of the UBN/Bloods Street Gang and CHRISTOPHER HEAD a/k/a BRISS used a telephone to discuss transporting gang dues to UBN/Bloods Street Gang leaders in New York.
30. In and around August or September, 2012, WILLIAM SYKES a/k/a BLACK slapped and choked a UBN/Bloods Street Gang prostitute for 15 to 20 minutes because the prostitute did not make enough money to satisfy SYKES.
31. On or about September 7, 2012, THADDAEUS SNOW a/k/a STORM used a telephone to discuss the wholesale price of cocaine base with WILLIAM SHARP MANNING a/k/a ILL WILL.
32. On or about September 8, 2012, THADDAEUS SNOW a/k/a STORM threatened to kill a prostitute working for the UBN/Bloods Street Gang when she did not answer her phone when SNOW called.
33. On or about September 8, 2012, THADDAEUS SNOW a/k/a STORM instructed WILLIAM SHARP MANNING a/k/a ILL WILL to stay with a prostitute working for the UBN/Bloods Street Gang so that the prostitute could not run away.
34. On or about September 8, 2012, WILLIAM SHARP MANNING a/k/a ILL WILL informed THADDAEUS SNOW a/k/a STORM that a prostitute MANNING was supervising for the UBN/Bloods Street Gang did not want to perform commercial sex acts and THADDAEUS SNOW a/k/a STORM told WILLIAM SHARP MANNING a/k/a ILL WILL that the prostitute does not get a say in where and when she performs commercial sex acts for the gang.

35. On or about September 8, 2012, THADDAEUS SNOW a/k/a STORM directed WILLIAM SHARP MANNING a/k/a ILL WILL to transport a prostitute working for the UBN/Bloods Street Gang from Virginia to a hotel in Beltsville, Maryland where SNOW was already prostituting two additional females.
36. On or about September 8, 2012, THADDAEUS SNOW a/k/a STORM directed WILLIAM SHARP MANNING a/k/a ILL WILL to pick-up ecstasy pills from a supplier for resale.
37. On or about September 9, 2012, CHRISTOPHER HEAD a/k/a BRISS and an unindicted member of the UBN/Bloods Street Gang used a telephone to discuss finding new suppliers of cocaine base and other illegal narcotics.
38. On or about September 10, 2012, THADDAEUS SNOW a/k/a STORM directed JAMES WATSON a/k/a BLACK KAT to transport a prostitute to a hotel where SNOW already had two prostitutes working for the UBN/Bloods Street Gang.
39. On or about September 10, 2012, THADDAEUS SNOW a/k/a STORM used a telephone to discuss purchasing heroin.
40. On or about September 12, 2012, THADDAEUS SNOW a/k/a STORM punched CANDY MINOR in the face repeatedly, such that she required medical attention, and threatened to kill her because of a dispute related to MINOR's management of a UBN/Bloods Street Gang prostitute.
41. On or about September 13, 2012, THADDAEUS SNOW a/k/a STORM used a telephone to coordinate UBN/Bloods Street Gang prostitutes being brought to Richmond with the leader of a Richmond UBN/Bloods Street Gang line-up.
42. On or about September, 14, 2012, THADDAEUS SNOW a/k/a STORM and DEONTAE HOLLAND a/k/a D-BOY used a telephone to discuss UBN/Bloods Street Gang business and selling crystal meth and various illegal pills.
43. On or about September 15, 2012, THADDAEUS SNOW a/k/a STORM and CURTIS MARTINO a/k/a CURTIS DODD a/k/a RED RUM used a telephone to coordinate the delivery of UBN/Bloods Street Gang dues to gang leadership in New York and discussed making money through narcotics sales.
44. On or about September 16, 2012, THADDAEUS SNOW a/k/a STORM and CURTIS MARTINO a/k/a CURTIS DODD a/k/a RED RUM used a telephone to discuss the arrest of a Norfolk UBN/Bloods Street Gang member by federal authorities and how MARTINO and SNOW might get ensnared in the federal investigation.

45. On or about September 17, 2012, THADDAEUS SNOW a/k/a STORM and GEORGE WILLIAMS a/k/a CHAMP used a telephone to select an individual they would purchase a pound of marijuana from using counterfeit Federal Reserve Notes.
46. On or about September 17, 2012, THADDAEUS SNOW a/k/a STORM advised DEONTAE HOLLAND a/k/a D-BOY that SNOW had counterfeit Federal Reserve Notes in \$10 denominations and local businesses were not detecting the fake money when SNOW used it to make purchases.
47. On or about September 18, 2012, THADDAEUS SNOW a/k/a STORM and JAMES WATSON a/k/a BLACK KAT used a telephone to discuss their need to obtain additional cocaine base for themselves and a UBN/Bloods Street Gang member in CURTIS MARTINO a/k/a CURTIS DODD a/k/a RED RUM's line-up. SNOW offered to contribute counterfeit Federal Reserve Notes to help fund a wholesale cocaine purchase from a source of supply located in Washington, D.C.
48. On or about September 20, 2012, WILLIAM SHARP MANNING a/k/a ILL WILL contacted THADDAEUS SNOW a/k/a STORM to discuss uttering counterfeit Federal Reserve Notes and SNOW prohibited MANNING from uttering the counterfeit currency in a certain geographic area.
49. On or about September 29, 2012, THADDAEUS SNOW a/k/a STORM instructed LATONYA SNOW not to rent more hotel rooms for use by a prostitute because the prostitute was not making enough money to be worth paying for the room.
50. In the early part of October, 2012, GEORGE WILLIAMS a/k/a CHAMP and DEONTAE HOLLAND a/k/a D-BOY transported a UBN/Bloods Street Gang prostitute to Virginia Beach, Virginia to perform commercial sex acts.
51. On or about October 2, 2012, WILLIAM SYKES a/k/a BLACK threatened to kill a UBN/Bloods Street Gang prostitute who was not making enough money for the gang.
52. In and around 2012, THADDAEUS SNOW a/k/a STORM directed that a prostitute would generally have to have sex with UBN/Bloods Street Gang members without compensation.
53. On or about December 6, 2012, THADDAEUS SNOW a/k/a STORM and NICOLE YATES a/k/a MERLOT attempted to abduct an individual from her home, within the Eastern District of Virginia, in order to compel her to prostitute for the benefit of UBN/Bloods Street Gang members.

54. In and around 2012, THADDAEUS SNOW a/k/a STORM sold \$400 in counterfeit Federal Reserve Notes to JANEY YATES a/k/a ALIZIA in exchange for \$200 of authentic Federal Reserve Notes.
55. In and around 2012, THADDAEUS SNOW a/k/a STORM, GEORGE WILLIAMS a/k/a CHAMP, and WILLIAM SYKES a/k/a BLACK transported a prostitute from Virginia to hotels in Frederick, Maryland so the prostitute could engage in commercial sex acts.
56. In 2012, WILLIAM SYKES a/k/a BLACK assaulted a prostitute at a hotel in Manassas, Virginia because she did not turn over the expected amount of profits from prostitution.
57. In 2012, JAMEEL ALEEM a/k/a NINO B distributed cocaine base to unindicted UBN/Bloods Street Gang members for further distribution.
58. On or about January 2, 2013, ANTWAN MINOR a/k/a NOID stored a .38 Special revolver at the house of an unindicted UBN/Bloods Street Gang member.
59. On or about January 11, 2013, ANTWAN MINOR a/k/a NOID arranged a sale of heroin from JAMEEL ALEEM a/k/a NINO B in Maryland.
60. On or about January 11, 2013, ANTWAN MINOR a/k/a NOID armed himself with a Smith & Wesson .38 special revolver for protection during a heroin transaction with JAMEEL ALEEM a/k/a NINO B in Maryland.
61. In and around 2012, THADDAEUS SNOW a/k/a STORM ordered subordinate UBN/Bloods Street Gang members to assault another member who did not return the proceeds of drug sales to SNOW as directed.
62. In and around 2012, THADDAEUS SNOW a/k/a STORM, CURTIS MARTINO a/k/a CURTIS DODD a/k/a RED RUM, and other UBN/Bloods Street Gang members assaulted another member who did not return the proceeds of drug sales to SNOW as directed.
63. In and around 2012, THADDAEUS SNOW a/k/a STORM sold \$5,000 in counterfeit Federal Reserve Notes to a UBN/Bloods Street Gang member.
64. In and around 2012, NICOLE YATES a/k/a MERLOT assaulted a prostitute at a Super 8 Hotel in Manassas, Virginia because the prostitute did not wish to see any more customers that day.

(In violation of Title 18, United States Code, Section 1962(d).)

COUNT 2

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 21 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. At all times relevant to this Indictment, the UBN/Bloods Street Gang constituted an enterprise as defined in Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that was engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

3. At all times relevant to this Indictment, the UBN/Bloods Street Gang, the above-described enterprise, through its members and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely: multiple acts involving the felonious distribution, receipt, buying, selling, and otherwise dealing in controlled substances, including cocaine, cocaine base (commonly known as “crack” cocaine), marijuana, heroin, Schedule II prescription painkillers, ecstasy, and other controlled substances, in violation of Title 21 U.S.C. Sections 841 and 846; multiple acts involving robbery in violation of Virginia Code Sections 18.2-58, 18.2-22, 18.2-26, and 18.2-27; and multiple acts indictable under the following provisions of Title 18, United States Code: Sections 472 and 473 (relating to counterfeiting); Section 1591 (related to peonage, slavery, and trafficking in persons); Section 1951 (relating to interference with commerce by robbery and extortion); and Section 2421 and 2422 (relating to interstate transportation for prostitution).

4. On or about the 1st day of April, 2010, in Fauquier County, in the Eastern District of Virginia and elsewhere, as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value from the UBN/Bloods Street Gang, and for the purpose of gaining entrance to and maintaining and increasing position in the UBN/Bloods Street Gang, an enterprise engaged in racketeering activity, the defendants, THADDAEUS SNOW a/k/a STORM, WILLIAM SYKES a/k/a BLACK, and JANEY YATES a/k/a ALIZIA did maim L.B., in violation of Virginia Code § 18.2-51.2.

(In violation of Title 18, United States Code, Section 1959(a)(2).)

COUNT 3

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 21 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

2. Paragraphs 2 and 3 of Count 2 of this Indictment are realleged and incorporated by reference as though fully set forth herein.

3. On or about the 12th day of April, 2010, in Fauquier County, in the Eastern District of Virginia and elsewhere, as consideration for the receipt of, and as consideration for a promise and agreement to pay, anything of pecuniary value from the UBN/Bloods Street Gang, and for the purpose of gaining entrance to and maintaining and increasing position in the UBN/Bloods Street Gang, an enterprise engaged in racketeering activity, the defendants, GEORGE WILLIAMS a/k/a CHAMP, WILLIAM SYKES a/k/a BLACK, and MARKEITH KERNS a/k/a LTK, and others known and unknown to the Grand Jury, did assault D.D., R.B., and A.H. with a dangerous weapon, in violation of Virginia Code § 18.2-51.2.

(In violation of Title 18, United States Code, Section 1959(a)(3).)

COUNT 4

THE GRAND JURY FURTHER CHARGES THAT:

On or about the 12th day of April, 2010, in Fauquier County, in the Eastern District of Virginia, the defendants, GEORGE WILLIAMS a/k/a CHAMP, WILLIAM SYKES a/k/a BLACK, and MARKEITH KERNS a/k/a LTK did knowingly carry, brandish, and discharge a firearm during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, to wit, assault with a dangerous weapon in aid of racketeering, as set forth in Count Three of this Indictment.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

COUNT 5

THE GRAND JURY FURTHER CHARGES THAT:

From in and around 2008 and continuing to on or about the date of this indictment, in the Eastern District of Virginia and elsewhere, Defendants THADDAEUS SNOW a/k/a STORM, CURTIS MARTINO a/k/a CURTIS DODD a/k/a RED RUM, WILLIAM SHARP MANNING a/k/a ILL WILL, WILLIAM SYKES a/k/a BLACK, CHRISTOPHER HEAD a/k/a BRISS, DEONTAE HOLLAND a/k/a D-BOY, JAMES WATSON a/k/a BLACK KAT, GEORGE WILLIAMS a/k/a CHAMP, MARKEITH KERNS a/k/a LTK, JANEY YATES a/k/a ALIZIA, AAYRON MARSHAL a/k/a MOOK, JOSHUA PENDLETON BROOKS a/k/a WACKO, LIONEL RITCHIE a/k/a BOOGIE, JAMEEL ALEEM, a/k/a NINO B, ANTWAN MINOR a/k/a NOID, DEYONKA GASKINS, JUSTIN FINLEY a/k/a J MO, STEPHON GREENE a/k/a BLITZ, and GRACIER ISIQUE, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with others, both known and unknown to the Grand Jury, to unlawfully, knowingly, and intentionally distribute and possess with intent to distribute two-hundred eighty (280) grams or more of a mixture and substance containing a detectable amount of cocaine base, commonly referred to as “crack” cocaine, in violation of Title 21, United States Code, Section 841(a)(1).

(In violation of Title 21, United States Code, Section 846.)

COUNT 6

THE GRAND JURY FURTHER CHARGES THAT:

On or about the 11th day of January, 2013, in the City of Manassas, in the Eastern District of Virginia, the defendant, ANTWAN MINOR a/k/a NOID, did knowingly possess a firearm, that is a Smith & Wesson .38 Special Revolver, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute heroin and possession with intent to distribute heroin.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

COUNT 7

THE GRAND JURY FURTHER CHARGES THAT:

On or about the 11th day of January, 2013, in the City of Manassas, in the Eastern District of Virginia, the defendant, ANTWAN MINOR a/k/a NOID, having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting interstate commerce, a firearm, that is, a Smith & Wesson .38 Special revolver.

(In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).)

COUNT 8

THE GRAND JURY FURTHER CHARGES THAT:

On multiple dates in and around 2009, 2010 and 2011, in the Eastern District of Virginia, the defendant, THADDAEUS SNOW a/k/a STORM, did knowingly possess a firearm, that is a handgun, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, conspiracy to distribute cocaine base and conspiracy to distribute marijuana.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

COUNT 9

THE GRAND JURY FURTHER CHARGES THAT:

From in and around 2011 and continuing to on or about the date of this indictment, in the Eastern District of Virginia and elsewhere, the defendants, THADDAEUS SNOW a/k/a STORM, WILLIAM SHARP MANNING a/k/a ILL WILL, WILLIAM SYKES a/k/a BLACK, DEONTAE HOLLAND a/k/a D-BOY, JAMES WATSON a/k/a BLACK KAT, GEORGE WILLIAMS a/k/a CHAMP, MARKEITH KERNS a/k/a LTK, JANEY YATES a/k/a ALIZIA, NICOLE YATES a/k/a MERLOT, CANDY MINOR, KALEEF TWEEDY a/k/a BLOODY TWEED, JUSTIN FINLEY a/k/a J MO, STEPHON GREENE a/k/a BLITZ, and LATONYA SNOW a/k/a LADY DYNASTY, conspired with each other, and with other persons both known and unknown to the grand jury to knowingly recruit, entice, harbor, transport, provide, obtain, maintain by any means, and benefit financially from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained in and affecting interstate commerce, P.S. and other individuals knowing and in reckless disregard of the fact that force, threats of force, and coercion would be used to cause P.S. and other individuals to engage in a commercial sex act.

(In violation of Title 18, United States Code, Section 1594(c).)

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COUNT 10

THE GRAND JURY FURTHER CHARGES THAT:

On or about the 30th day of April, 2012, in the Eastern District of Virginia, and elsewhere, the defendants, THADDAEUS SNOW a/k/a STORM, NICOLE YATES a/k/a MERLOT, CANDY MINOR, KALEEF TWEEDY a/k/a BLOODY TWEED, and DEVANTE JORDAN a/k/a TREY did knowingly combine, conspire, confederate, and agree with each other, and with others both known and unknown to the grand jury, to unlawfully obstruct, delay and affect, and attempt to obstruct, delay and affect, commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery as that term is defined in Title 18, United States Code, Section 1951, in that the defendants agreed to unlawfully take and obtain personal property consisting of marijuana and currency representing the proceeds from the sale of marijuana from the person of D.B., against his will by means of actual and threatened force, violence, and fear of injury, immediate and future, to his person, that is, the defendants threatened D.B. with bodily harm and death by use of a firearm.

(In violation of Title 18, United States Code, Section 1951.)

COUNT 11

THE GRAND JURY FURTHER CHARGES THAT:

On or about the 30th day of April, 2012, in the City of Manassas, in the Eastern District of Virginia, the defendants, THADDAEUS SNOW a/k/a STORM, NICOLE YATES a/k/a MERLOT, CANDY MINOR, KALEEF TWEEDY a/k/a BLOODY TWEED, and DEVANTE JORDAN a/k/a TREY did knowingly use and carry a firearm during and in relation to, and possess a firearm in furtherance of, a crime of violence for which they may be prosecuted in a court of the United States, to wit, conspiracy to interfere with commerce by robbery, as set forth in Count Ten of this Indictment.

(In violation of Title 18, United States Code, Section 924(c)(1)(A).)

A TRUE BILL

~~Perjury to the U.S. Government Act,~~
the original of this page has been filed
under seal in the Clerk's Office.

FOREPERSON OF THE GRAND JURY

NEIL H. MACBRIDE
UNITED STATES ATTORNEY

BY:



Adam B. Schwartz
Assistant United States Attorney